

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

NEWPORT NEWS DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 4:23cr54
	)	
AMANDA BELL	)	

UNITED STATES' RESPONSE TO DEFENDANT'S REQUEST FOR FURLOUGH

Comes now the United States by and through undersigned counsel and represents to the Court that upon review of defense counsel's Motion for Furlough, the United States does not oppose the request, provided that the defendant is placed in the third-party custody of her parents and that she be required to stay at their residence with electronic monitoring with time-outs for medical appointments only.

The defendant was previously on bond which was revoked for commission of a new crime. The United States has little confidence that the defendant will remain compliant if placed on furlough. However, the life of her unborn child must be considered in the evaluation of a possible furlough. In agreeing to the furlough, the United States urges the Court to impose the additional terms listed above and to consider the most restrictive additional provisions available, consistent with the health of the child.

Respectfully submitted,

Erik S. Seibert  
United States Attorney

By: \_\_\_\_\_/s/\_\_\_\_\_  
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Certificate of Service

I certify that on April 22, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

By:                     /s/                      
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